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**From:** Buckley, Timothy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=197A3461D9824A17850F34CC2B0B37FE-BUCKLEY, TIMOTHY]  
**Sent:** 8/2/2019 3:03:29 PM  
**To:** Medina-Vera, Myriam [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b081a1f48a044b4c9d1ebc4992c54dee-Medina-Vera, Myriam]  
**CC:** Sullivan, Kate [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1ae54d9bb036451b8df78d633b928662-Sullivan, Kate]; Strynar, Mark [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5a9910d5b38e471497bd875fd329a20a-Strynar, Mark]; McCord, James [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=McCord, James]  
**Subject:** RE: NJDEP request for EPA-NERL lab analysis

Thanks Myriam. This looks good. I will talk to Kate about amending the QAPP. If she can't do it, I can.

Tim

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**From:** Medina-Vera, Myriam <Medina-Vera.Myriam@epa.gov>  
**Sent:** Friday, August 2, 2019 10:56 AM  
**To:** Buckley, Timothy <Buckley.Timothy@epa.gov>  
**Cc:** Sullivan, Kate <Sullivan.Kate@epa.gov>; Strynar, Mark <Strynar.Mark@epa.gov>; McCord, James <mccord.james@epa.gov>  
**Subject:** RE: NJDEP request for EPA-NERL lab analysis

Tim,

Please- note the comments highlighted. Clean proposed scheduled is at the end.

## Ex. 5 Deliberative Process (DP)

## Ex. 5 Deliberative Process (DP)

Myriam Medina-Vera, Ph.D.  
Chief PHCB/EMMD/NERL  
Research Triangle Park, NC

Voice: 919-541-5016  
Fax: 919-541-0239  
Mobile: Ex. 6 Personal Privacy (PP)

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**From:** Buckley, Timothy <[Buckley.Timothy@epa.gov](mailto:Buckley.Timothy@epa.gov)>  
**Sent:** Friday, August 02, 2019 10:40 AM  
**To:** Medina-Vera, Myriam <[Medina-Vera.Myriam@epa.gov](mailto:Medina-Vera.Myriam@epa.gov)>  
**Cc:** Sullivan, Kate <[Sullivan.Kate@epa.gov](mailto:Sullivan.Kate@epa.gov)>; Strynar, Mark <[Strynar.Mark@epa.gov](mailto:Strynar.Mark@epa.gov)>; McCord, James <[mccord.james@epa.gov](mailto:mccord.james@epa.gov)>  
**Subject:** RE: NJDEP request for EPA-NERL lab analysis

Myriam,

I'm sorry if I wasn't clear. I need to know the schedule for responding to NJ request. Please modify the dates in my draft email to reflect what we can accommodate.

Tim

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**From:** Medina-Vera, Myriam <[Medina-Vera.Myriam@epa.gov](mailto:Medina-Vera.Myriam@epa.gov)>  
**Sent:** Friday, August 2, 2019 10:32 AM  
**To:** Buckley, Timothy <[Buckley.Timothy@epa.gov](mailto:Buckley.Timothy@epa.gov)>  
**Cc:** Sullivan, Kate <[Sullivan.Kate@epa.gov](mailto:Sullivan.Kate@epa.gov)>; Strynar, Mark <[Strynar.Mark@epa.gov](mailto:Strynar.Mark@epa.gov)>; McCord, James <[mccord.james@epa.gov](mailto:mccord.james@epa.gov)>  
**Subject:** RE: NJDEP request for EPA-NERL lab analysis

Tim,

Based on your response:

## Ex. 5 Deliberative Process (DP)

I think this is the best that can be done based on availability.

Myriam Medina-Vera, Ph.D.  
Chief PHCB/EMMD/NERL  
Research Triangle Park, NC  
Voice: 919-541-5016  
Fax: 919-541-0239  
Mobile: Ex. 6 Personal Privacy (PP)

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**From:** Buckley, Timothy <[Buckley.Timothy@epa.gov](mailto:Buckley.Timothy@epa.gov)>  
**Sent:** Friday, August 02, 2019 10:16 AM

**To:** Medina-Vera, Myriam <Medina-Vera.Myriam@epa.gov>  
**Cc:** Sullivan, Kate <Sullivan.Kate@epa.gov>; Strynar, Mark <Strynar.Mark@epa.gov>; McCord, James <mccord.james@epa.gov>  
**Subject:** RE: NJDEP request for EPA-NERL lab analysis

Myriam,

I do not think we should delay NY reporting. Can you modify the schedule to accommodate NY reporting first.

Tim

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**From:** Medina-Vera, Myriam <Medina-Vera.Myriam@epa.gov>  
**Sent:** Friday, August 2, 2019 10:03 AM  
**To:** Buckley, Timothy <Buckley.Timothy@epa.gov>  
**Cc:** Sullivan, Kate <Sullivan.Kate@epa.gov>; Strynar, Mark <Strynar.Mark@epa.gov>; McCord, James <mccord.james@epa.gov>  
**Subject:** RE: NJDEP request for EPA-NERL lab analysis

Tim,

Mark told me that this was just discussed. I was meeting with Kent Thomas about PFAS in SHC product 5.5.5. Mark stated that is doable if things get re-prioritize.

This means- NY will be delayed. James can start looking at the NY data but cannot process and analyze samples at the same time. Will you talk to Jeff Ryan?

Myriam Medina-Vera, Ph.D.  
Chief PHCB/EMMD/NERL  
Research Triangle Park, NC  
Voice: 919-541-5016  
Fax: 919-541-0239  
Mobile: Ex. 6 Personal Privacy (PP)

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**From:** Buckley, Timothy <Buckley.Timothy@epa.gov>  
**Sent:** Friday, August 02, 2019 9:49 AM  
**To:** Medina-Vera, Myriam <Medina-Vera.Myriam@epa.gov>  
**Cc:** Sullivan, Kate <Sullivan.Kate@epa.gov>  
**Subject:** RE: NJDEP request for EPA-NERL lab analysis

Myriam,

I am looking for specificity as indicated below. Can this schedule be accommodated?

Tim

DRAFT EMAIL

## Ex. 5 Deliberative Process (DP)

# Ex. 5 Deliberative Process (DP)

**From:** Medina-Vera, Myriam <Medina-Vera.Myriam@epa.gov>

**Sent:** Thursday, August 1, 2019 9:14 AM

**To:** Buckley, Timothy <Buckley.Timothy@epa.gov>

**Cc:** Sullivan, Kate <Sullivan.Kate@epa.gov>

**Subject:** RE: NJDEP request for EPA-NERL lab analysis

Myriam Medina-Vera, Ph.D.

Chief PHCB/EMMD/NERL

Research Triangle Park, NC

Voice: 919-541-5016

Fax: 919-541-0239

Mobile: Ex. 6 Personal Privacy (PP)

**From:** Buckley, Timothy <Buckley.Timothy@epa.gov>

**Sent:** Tuesday, July 30, 2019 8:29 AM

**To:** Sullivan, Kate <Sullivan.Kate@epa.gov>; Medina-Vera, Myriam <Medina-Vera.Myriam@epa.gov>

**Subject:** FW: NJDEP request for EPA-NERL lab analysis

Myriam and Kate,

Tim Watkins has agreed to do this additional work. Can you give me your best estimate for:

- 1.
- 2.
- 3.
- 4.

# Ex. 5 Deliberative Process (DP)

Can you get for me by the end of the day?

Thanks.

Tim

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**From:** Buckley, Timothy  
**Sent:** Wednesday, June 26, 2019 2:37 PM  
**To:** Sullivan, Kate <[Sullivan.Kate@epa.gov](mailto:Sullivan.Kate@epa.gov)>; Medina-Vera, Myriam <[Medina-Vera.Myriam@epa.gov](mailto:Medina-Vera.Myriam@epa.gov)>  
**Subject:** FW: NJDEP request for EPA-NERL lab analysis

Myriam and Kate,

See request below. I have forwarded to TimW for approval. Anticipating his approval, can the two of you be thinking about how and when we might be able to get this done?

Thanks.

Tim

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**From:** Bergman, Erica <[Erica.Bergman@dep.nj.gov](mailto:Erica.Bergman@dep.nj.gov)>  
**Sent:** Tuesday, June 25, 2019 4:56 PM  
**To:** Buckley, Timothy <[Buckley.Timothy@epa.gov](mailto:Buckley.Timothy@epa.gov)>  
**Cc:** Azzam, Nidal <[Azzam.Nidal@epa.gov](mailto:Azzam.Nidal@epa.gov)>; Maybury, Steve <[Steve.Maybury@dep.nj.gov](mailto:Steve.Maybury@dep.nj.gov)>; Goodrow, Sandra <[Sandra.Goodrow@dep.nj.gov](mailto:Sandra.Goodrow@dep.nj.gov)>  
**Subject:** NJDEP request for EPA-NERL lab analysis

Tim,

NJDEP is in receipt of some preliminary analytical information from EPA-NERL regarding the detection of chloro-perfluoro polyether carboxylate (CIPFPECA) congeners (known to be Solvay's PFAS replacement) in aqueous samples that correspond to several private drinking water locations. These samples were collected as part of the NJDEP-EPA-NERL and EPA Region 2 cooperative study "Detection, Evaluation, and Assignment of Multiple Poly- and Perfluoroalkyl Substances (PFAS) in Environmental Media from an Industrialized Area of New Jersey". EPA-NERL could not definitively quantify CIPFPECA due to the lack of an analytical standard, however potential concentrations could be elevated due to peak heights relative to known concentrations of other PFAS.

There is also a potential for human toxicity when exposed to these congeners, since NJDEP received Safety Data Sheets submitted by Solvay, which indicate toxicity in lab animals, specifically 28 day and 90 day repeated dose toxicity studies in rats which indicated that these PFAS cause liver toxicity at very low doses. NJDEP's toxicologist, Gloria Post Ph.D. DABT conducted a full review of Solvay's submittal and reports:

"...the No Observed Adverse Effect Level (NOAEL) for three CAS #s in the 28 day rat study were below 0.3 mg/kg/day. This means that 0.3 mg/kg/day was the lowest dose used in the study, and that toxicity occurred at that dose. Therefore, a dose that did not cause toxicity (NOAEL) was not identified. For the 90 day rat study, the NOAEL was 0.05 mg/kg/day in males and 0.1 mg/kg/day in females. Since the same doses were likely used in both males and females, this indicates that toxicity occurred in males at 0.1 mg/kg/day (a very low dose). For comparison, the levels at which toxicity occurred for this substance are similar (or possibly even lower) than for PFOA and PFNA."

The private potable wells with detections of CIPFPECA congeners currently have Granular Activated Carbon (GAC) Point of Entry Treatment Systems (POETs) installed due to past detections of other PFAS (i.e., PFNA, PFOA) above NJDEP Groundwater Quality Standards, or Preliminary MCLs. However, it is unknown if the POETs are treating the CIPFPECA since there are no known treatability studies for this compound. NJDEP would like to sample 4-5 private well locations, including influent, mid-fluent and effluent samples for each location. This would be approximately 15 samples, not including QC samples. Does EPA-NERL have the capacity to analyze these aqueous samples for the CIPFPECA congeners? This analysis request could be considered outside the research study, and be more geared towards a public health concern/priority.

Please let us know if EPA/NERL can conduct this analysis and if so, when would they have the capacity? As discussed with Nidal Azzam (copied here), EPA-Region 2 shares our concerns regarding a potential public health issue and plan to support DEP's request for NERL analytical support. Please let me know if you need any additional information.

Thank you,

*Erica Bergman*

**NJ Department of Environmental Protection**

Site Remediation Program – Bureau of Case Management

401 E. State Street - Mail Code 401-05F

P.O. Box 420

Trenton, NJ 08625-0420

[erica.bergman@dep.nj.gov](mailto:erica.bergman@dep.nj.gov)

609-292-7406

